

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

[1] MARTHA DONELSON and )  
[2] JOHN FRIEND, ON BEHALF )  
OF THEMSELVES AND ON )  
BEHALF OF ALL SIMILARLY )  
SITUATED PERSONS, )

Plaintiffs, )

v. )

Case No. 14-CV-316-JHP-TLW

[1] UNITED STATES OF AMERICA, )  
DEPARTMENT OF INTERIOR, )  
BUREAU OF INDIAN AFFAIRS, et al., )

Defendants. )

**DEFENDANT KAISER-FRANCIS ANADARKO, LLC'S MOTION TO DISMISS**

Defendant Kaiser-Francis Anadarko, LLC hereby moves to dismiss Plaintiffs' First Amended Complaint pursuant to F.R.C.P Rule 12(b)(1), (6) and (7).

In support of its motion, Defendant Kaiser-Francis Anadarko, LLC adopts the arguments and authorities set forth in the motions filed by B&G Oil Company and Wellco Energy, Inc. [Doc. No. 124]; Devon Energy Production Co., L.P., and Linn Energy Holdings, LLC [Doc. No. 136]; The Link Company et. al. [Doc. No. 137]; and Performance Energy Resources, L.P. et. al. [Doc. No. 138].

Defendant Kaiser-Francis Anadarko, LLC prays that the Court dismiss with prejudice Plaintiffs' First Amended Complaint and grant it reasonable attorney fees, costs, and all other relief to which the Court determines to be just and proper.

RESPECTFULLY SUBMITTED,

/s/ Frederic Dorwart

Frederic Dorwart, OBA #2436

J. Michael Medina, OBA #6113

Paul DeMuro, OBA #17605

Miriam Lee Sweetin, OBA #30270

FREDERIC DORWART, LAWYERS

124 East Fourth Street

Tulsa, Oklahoma 74103

(918) 583-9922 - telephone

(918) 583-8251 - facsimile

*Counsel for Defendant*

*Kaiser-Francis Anadarko, LLC*

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that on the 7<sup>th</sup> day of October, 2014, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the applicable ECF registrants.

/s/ Frederic Dorwart